

LARA R. SHAPIRO (State Bar No. 227194)  
4145 Via Marina # 324  
Marina del Rey, CA 90292  
Telephone: (310) 577-0870  
Facsimile: (424) 228-5351  
Shapiro.lara@gmail.com

Attorney for Plaintiff,

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Schakina Hunt

Plaintiff,

vs.

Account Control Technology, Inc.; and  
DOES 1-10, inclusive,

Defendants.

Case No. **CV 11 3995**

**COMPLAINT FOR DAMAGES  
1. VIOLATION OF FAIR DEBT  
COLLECTION PRACTICES ACT,  
15 U.S.C. § 1692 ET. SEQ;**

**JURY TRIAL DEMANDED**

For this Complaint, the Plaintiff, Schakina Hunt, by undersigned counsel,  
states as follows:

**INTRODUCTION**

1. This is an action for actual and statutory damages brought by Plaintiff,  
Schakina Hunt, an individual consumer, against Defendant, Account Control  
Technology, Inc., for violations of the Fair Debt Collection Practices Act, 15  
U.S.C. § 1692 *et seq.* (hereinafter "FDCPA"), which prohibits debt collectors  
from engaging in abusive, deceptive, and unfair practices.

**ORIGINAL**

COMPLAINT FOR DAMAGES

**JURISDICTION**

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1337. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202. Venue in this District is proper in that the Defendant transacts business here.

**PARTIES**

3. Plaintiff, Schakina Hunt, is a natural person with a permanent residence in Charlotte, Mecklenburg County, North Carolina, 28215.

4. Upon information and belief the Defendant, Account Control Technology, Inc., is a corporation engaged in the business of collecting debt in this state and in several other states, with its principal place of business in this District located at 6918 Owensmouth Ave, Canoga Park, Los Angeles County, California, 91303. The principal purpose of Defendant is the collection of debts in this state and several other states, and Defendant regularly attempts to collect debts alleged to be due another.

5. Defendant is engaged in the collection of debts from consumers using the mail and telephone. Defendant regularly attempts to collect consumer debts alleged to be due to another. Defendant is a “debt collector” as defined by the FDCPA, 15 U.S.C. § 1692a(6).

**FACTUAL ALLEGATIONS**

6. Upon information and belief, Defendant began placing collection calls to Plaintiff in May of 2011.

7. The debt Defendant is attempting to collect on is an alleged obligation of a consumer to pay money arising out of a transaction in which the money, property, insurance or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation has been reduced to judgment.

8. Within one (1) year preceding the date of this Complaint, Defendant, in connection with the collection of the alleged debt, stated to Plaintiff that she could not consolidate her loans and that her only option was the Defendant's rehabilitation program.

9. Plaintiff is consolidating her loans, including the alleged debt.

10. The representations made to Plaintiff by Defendant regarding consolidation were false.

11. The natural consequence of Defendant's statements was to produce an unpleasant and/or hostile situation between Defendant and Plaintiff.

12. The natural consequence of Defendant's statements was to cause Plaintiff mental distress.

**PRAYER FOR RELIEF**

13. Plaintiff repeats and realleges and incorporates by reference to the foregoing paragraphs.

14. Defendants violated the FDCPA. Defendants' violations include, but are not limited to, the following:

(a) Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequences of which is to harass, oppress, or abuse any person in connection with the collection of an alleged debt; and

(b) Defendant violated §1692e of the FDCPA by using a false, deceptive, or misleading representation or means in connection with the collection of the alleged debt; and

(c) Defendant violated §1692e(10) of the FDCPA by using false representation or deceptive means in connection with the collection the alleged debt; and

(d) Defendant violated §1692f of the FDCPA by using unfair or unconscionable means in connection with the collection of an alleged debt.

15. Defendant's acts as described above were done intentionally with the purpose of coercing Plaintiff to pay the alleged debt.

16. As a result of the foregoing violations of the FDCPA, Defendant is liable to the Plaintiff, Schakina Hunt, for declaratory judgment that Defendant's conduct violated the FDCPA, actual damages, statutory damages, and costs and attorney fees.

1 WHEREFORE, Plaintiff respectfully requests that judgment be entered  
2  
3 against Defendant, Account Control Technology, Inc., for the following:

- 4 A. Declaratory judgment that Defendant's conduct violated the  
5 FDCPA.  
6 B. Actual damages.  
7 C. Statutory damages pursuant to 15 U.S.C. § 1692k.  
8  
9 D. Costs and reasonable attorney fees pursuant to 15 U.S.C. §  
10 1692k.  
11 E. Awarding Plaintiff any pre-judgment and post-judgment  
12 interest as may be allowed under the law.  
13 F. For such other and further relief as the Court may deem just and  
14 proper.

15 **DEMAND FOR JURY TRIAL**

16 PLEASE TAKE NOTICE that Plaintiff, SCHAKINA HUNT, demands trial  
17 by jury in this action.

18  
19 DATED: August 10, 2011

LARA SHAPIRO

20  
21 By: Lara Shapiro / up  
22 Lara R. Shapiro

23 Attorney for Plaintiff  
24 Schakina Hunt  
25  
26  
27  
28